

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

IN RE:

CASE NO.: 6:13-bk-09074-ABB
Chapter 13

MICHAEL HARTMAN
NANCY HARTMAN,

Debtors.

**OBJECTION BY WELLS FARGO BANK, N.A. TO CONFIRMATION
OF CHAPTER 13 PLAN FILED BY THE DEBTORS**

Creditor, WELLS FARGO BANK, N.A., AS SUCCESSOR IN INTEREST TO WACHOVIA BANK, N.A., (hereinafter referred to as "WELLS"), by and through its undersigned counsel, files its Objection to Debtor's Chapter 13 Plan pursuant to 11 U.S.C. §§ 506, 1307, 1324, 1325(a), and Federal Rules of Bankruptcy Procedure 3012, and in support states as follows:

1. The Debtor filed for relief under Chapter 13 of the Bankruptcy Code on July 23, 2013.
2. The Court has jurisdiction of this matter pursuant to 28 U.S.C. §157(b)(2)(A), (b)(2)(G) and §1334.
3. WELLS is a creditor of the Debtor by way of a Prime Equity Line of Credit Agreement dated March 14, 2013.
4. Debtor currently owes WELLS an aggregate amount of \$35,048.01. A Proof of Claim has been filed by WELLS which sets forth in detail the amounts due and owing.
5. WELLS objects to the Debtors' Plan as it contains numerous inaccuracies and inconsistencies regarding the claim of WELLS.

6. First and foremost, Debtor Nancy Hartman is over the allowable debt limits for a Chapter 13 case.

7. In addition, the Debtors propose a monthly plan payment of \$11,000.00 per month; however, the Debtors do not indicate enough income on Schedule I and Schedule J to support the monthly plan payment as proposed.

8. Accordingly, the Debtors' Plan lacks feasibility and fails to meet the requirements for confirmation.

9. WELLS seeks reimbursement for its attorneys fees incurred in the filing of these objections as WELLS is secured and the loan documentation provides for such reimbursement from the Debtor.

WHEREFORE, Creditor, WELLS FARGO BANK, N.A., AS SUCCESSOR IN INTEREST TO WACHOVIA BANK, N.A., respectfully requests this Honorable Court deny confirmation of the Debtor's proposed Chapter 13 Plan, and/or dismiss this case, award reasonable attorneys fees, and such further relief the Court deems just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via electronic mail or U.S. mail to: Michael and Nancy Hartman 2308 Island Club Way Orlando, FL 32822, Brad Bader of the Law Office of Kaugman Englett and Lynd 11 N. Magnolia Avenue Suite 1600 Orlando, FL 32801; Laurie K. Weatherford P.O Box 3450 Winter Park, FL 32790; United States Trustee-ORL 7/13 Office of the United States Trustee, George C Young Building 400 W Washington St, Suite 1100, Orlando, FL 32801, this 21st day of October Orlando, 2013.

KELLEY & FULTON, P.A.
Attorney for Wells Fargo Bank, N.A., as
Successor in Interest to Wachovia Bank, N.A.
1665 Palm Beach Lakes Blvd.
The Forum - Suite 1000
West Palm Beach, Florida 33401
Tel: (561) 491-1200
Fax: (561) 684-3773
By: /s/ Craig I. Kelley

Craig I. Kelley, Esquire
Florida Bar No.: 782203

Label Matrix for local noticing
113A-6
Case 6:13-bk-09074-ABB
Middle District of Florida
Orlando
Thu Aug 22 13:36:56 EDT 2013

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Stonewood Towers Condominium Association, In
c/o Carlos R. Arias, Esq.
Clayton & McCulloh
1065 Maitland Center Commons Blvd.
Maitland, FL 32751-7437

Wells Fargo Bank, N.A., successor by merger
Law Offices of Dennis LeVine & Associate
P.O. Box 707
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Abn Amro Mortgage Grou
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Ally Financial
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Phoenix, AZ 85062-8234

(p)BANK OF AMERICA
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EL PASO TX 79998-2238

Capl/bstby
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Mettawa, IL 60045-3438

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Wilmington, DE 19850-5298

Citi
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Sioux Falls, SD 57117-6241

(p)CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

Citimortgage
P.O. Box 653084
Dallas, TX 75265-3084

Credit First/CFNA
Bk13 Credit Operations
Po Box 818011
Cleveland, OH 44181-8011

First Southern Bank
945 S. Orange Ave
Orlando, FL 32806-1212

Florida Department of Revenue
Bankruptcy Unit
Post Office Box 6668
Tallahassee FL 32314-6668

Gecrb/tydc
Po Box 965005
Orlando, FL 32896-5005

Internal Revenue Service
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Philadelphia PA 19101-7346

M&W Marine
1529 Bishop Branch Road
Pendleton, SC 29670-9705

Orange County Property Taxes
200 S. Orange Ave.
Suite 1700
Orlando, FL 32801-3438

Orange County Tax Collector
Attn: Earl K. Wood
Post Office Box 2551
Orlando FL 32802-2551

Regions Bank
Po Box 11007
Birmingham, AL 35288-0001

Sallie Mae
Attn: Claims Department
Po Box 9500
Wilkes-Barre, PA 18773-9500

Santander Consumer USA
P.O. BOX 560284
Dallas, TX 75356-0284

Santander Consumer Usa
Po Box 961245
Ft Worth, TX 76161-0244

Stonewood Towers Condo Assoc
820 N Atlantic Avenue
Cocoa Beach, FL 32931-3199

United States Attorney
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Orlando FL 32805-2281

Wells Fargo Bank Nv Na
Attn: Deposits Bankruptcy MAC# P6103-05K
Po Box 3908
Portland, OR 97208-3908

Wells Fargo Bank, N.A.
P.O. Box 19657
Irvine, CA 92623-9657

(p)WELLS FARGO BANK NA

WELLS FARGO HOME MORTGAGE AMERICAS SERVICING

ATTN BANKRUPTCY DEPT MAC X7801-014

3476 STATEVIEW BLVD

FORT MILL SC 29715-7203

WFS Financial/Wachovia Dealer Svcs

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Winter Park, FL 32790-3450

United States Trustee - ORL7/13 7+

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Orlando, FL 32801-2367

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank Of America

Attention: Recovery Department

4161 Piedmont Pkwy.

Greensboro, NC 27410

(d)Bank Of America

Po Box 982235

El Paso, TX 79998

Citibank Sd, Na

Attn: Centralized Bankruptcy

Po Box 20363

Kansas City, MO 64195

(d)Citibank Usa

Citicorp Credit Services/Attn:Centralize

Po Box 20507

Kansas City, MO 64195

(d)ExxmbLCiti

Attn.: Centralized Bankruptcy

Po Box 20507

Kansas City, MO 64195

(d)Unvl/citi

Attn.: Centralized Bankruptcy

Po Box 20507

Kansas City, MO 64195

Wells Fargo Hm Mortgag

8480 Stagecoach Cir

Frederick, MD 21701

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Wells Fargo Bank, NA

(d)Stonewood Towers Condominium Association,

c/o Carlos R. Arias, Esq.

Clayton & McCulloh

1065 Maitland Center Commons Blvd.

Maitland, FL 32751-7437

End of Label Matrix

Mailable recipients 38

Bypassed recipients 2

Total 40